

# Esports Wales

## Use of Inside Information Policy

**Status:** Board-approved policy

**Applies to:** Directors, Staff, Volunteers, Members, Players, Officials, Clubs, Partners

**Owner:** Board of Directors

**Integrity & Ethics Lead:** Board-appointed Director / Senior Officer

**Review cycle:** Annual

**Next review due:** 12 months from adoption

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### 1. Purpose

1.1 This policy sets out **Esports Wales CIC's** ("the Company") approach to the **proper handling and use of inside information** to protect the integrity, fairness, and reputation of esports competitions and governance.

1.2 It exists to:

- prevent the misuse of confidential or non-public information
  - protect fair competition and decision-making
  - reduce the risk of betting related corruption or manipulation
  - provide clear expectations and reporting duties
  - support compliance with integrity and governance standards
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### 2. Scope

2.1 This policy applies to:

- Board members



- staff and volunteers
- players and participants
- coaches, managers, and team staff
- officials and referees
- contractors, suppliers, and partners

2.2 It applies to information obtained:

- through roles or responsibilities with Esports Wales
- in connection with competitions, events, governance, or operations
- in online, offline, or digital environments

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### 3. What Is Inside Information?

3.1 **Inside information** is any information that:

- is **non-public** or confidential, and
- relates to Esports Wales competitions, events, participants, or governance, and
- could reasonably be expected to **influence competitive outcomes, decisions, or betting activity** if disclosed or misused

3.2 Inside information may include (not exhaustive):

- team selection or roster changes
- injuries, illnesses, or availability of players
- disciplinary matters or sanctions not yet public
- competition formats, draws, or scheduling changes
- technical issues, rule interpretations, or vulnerabilities



- governance or regulatory decisions not yet announced
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#### 4. Core Principles

Esports Wales is guided by the following principles:

- **Confidentiality** – inside information must be protected
  - **Fairness** – no individual should gain an unfair advantage
  - **Integrity** – information must not be misused for personal or third-party gain
  - **Accountability** – those with access to information have clear responsibilities
  - **Transparency in Reporting** – concerns must be reported promptly
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#### 5. Prohibited Use of Inside Information

The following behaviours are **strictly prohibited**:

- using inside information to influence competition outcomes
  - using inside information for betting or gambling purposes
  - sharing inside information with others for competitive or betting advantage
  - providing tips, predictions, or guidance based on inside information
  - enabling or facilitating misuse of inside information by third parties
  - failing to safeguard confidential information appropriately
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#### 6. Betting & Gambling Considerations

6.1 The use of inside information for betting or gambling purposes is **strictly prohibited**, regardless of:

- whether betting is legal in the jurisdiction



- whether the individual places the bet themselves or via another person

6.2 Such conduct may constitute:

- a breach of this policy
  - a breach of the **Betting & Gambling Policy (0403)**
  - potential match-fixing or competition manipulation
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## 7. Duty to Protect & Report

7.1 All individuals covered by this policy have a duty to:

- protect inside information from unauthorised disclosure
- avoid situations where misuse could occur
- report any suspected or actual misuse of inside information

7.2 Failure to report suspected misuse may itself be treated as a breach of this policy.

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## 8. Reporting Concerns

8.1 Concerns relating to inside information may be reported via:

- the Integrity & Ethics Lead
- line management or event organisers
- complaints procedures
- whistleblowing routes

8.2 Reports may be made:

- confidentially
- in good faith

8.3 No individual will be disadvantaged for raising concerns responsibly.

Policy Number: P0406

Version Number: 001



Esports Wales CIC: 12372413

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## **9. Responding to Alleged Breaches**

9.1 Alleged breaches of this policy will be:

- taken seriously
- assessed promptly and impartially
- handled in line with principles of fairness and natural justice

9.2 Esports Wales may:

- conduct investigations
- impose interim measures (e.g. suspension from roles or competition)
- refer matters to external bodies or authorities where appropriate

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## **10. Sanctions**

10.1 Confirmed breaches of this policy may result in:

- disqualification from competition
- suspension or banning
- removal from roles or positions
- disciplinary or governance action
- referral to regulators, betting integrity bodies, or law enforcement

10.2 Sanctions will be:

- proportionate
- consistent
- clearly communicated



## **11. Education & Prevention**

11.1 Esports Wales will:

- promote awareness of inside-information risks
- provide guidance to those in higher-risk roles
- integrate this policy into integrity education where appropriate

11.2 Clubs and partners are expected to support prevention and awareness efforts.

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## **12. Confidentiality & Information Handling**

12.1 Inside information must be:

- stored securely
- shared only with authorised individuals
- disclosed externally only where permitted or required

12.2 Improper disclosure may itself constitute a breach of this policy.

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## **13. Roles & Responsibilities**

### **13.1 Board of Directors**

- holds ultimate responsibility for integrity and oversight
- ensures appropriate policies and enforcement mechanisms

### **13.2 Integrity & Ethics Lead**

- oversees implementation of this policy
- manages reports and investigations
- reports issues and trends to the Board

### **13.3 All Individuals**

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- must comply with this policy
  - must act responsibly and ethically
  - must report concerns
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#### **14. Linked Policies & Procedures**

This policy must be read alongside:

- **P0401 Integrity & Ethics Policy**
  - **P0402 MatchFixing & Competition Manipulation Policy**
  - **P0403 Betting & Gambling Policy**
  - **P0404 AntiBribery & Corruption Policy**
  - **P0109 Conflicts of Interest Policy**
  - **P0110 Gifts & Hospitality Policy**
  - **P0116 Whistleblowing Policy**
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#### **15. Monitoring & Review**

15.1 Esports Wales will:

- monitor integrity-related concerns and trends
  - review this policy annually
  - update it in response to emerging risks or governance requirements
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#### **16. Adoption**


This Use of Inside Information Policy was approved by the Board of Directors of **Esports Wales CIC**.

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**Date approved:** \_\_\_02/03/2026\_\_\_

**Signed (Chair):** \_\_\_  \_\_\_

